

IN THE UNITED STATES DISTRICT COURT
WESTERN [REDACTED] DISTRICT OF PENNSYLVANIA

MICHAEL McCOLE,
Petitioner

V.

PA. BD. of PROBATION
AND PAROLE

CIVIL ACTION NO. 04-261-E


Respondents

MOTION FOR EXTENSION OF TIME

AND NOW COMES, the Petitioner in the above captioned matter, and respectfully moves this Honorable Court for an Order extending the time in which this Petitioner may file responses to any and all pleadings arising out of the filing of his Federal Writ of Habeas Corpus. In support thereof, Petitioner avers the following:

1. Due to limited time available to this Petitioner in the prison law library, Petitioner needs an added fifteen (15) days to comply with all rules and perfect any responses that may be called for.
2. Petitioner's status as an unschooled, pro se litigant calls for leniency, as a matter of grace and propriety.
3. The matters involved in the Federal Writ of Habeas Corpus are numerous and require intensive research and examination of related pleadings.
4. The time allotted by law is not adequate, therefore Petitioner can not comply nor complete any required responses that may be mandated of him in the time frames set forth.
5. Petitioner requests that the time limitations be liberally extended for the benefit of justice and all parties involved and this request is in no way being used as a result of any dilatory purpose, but rather to insure that Petitioner effectively and adequately represents the himself and the issues raised therein.

WHEREFORE, based on the foregoing, Petitioner respectfully urges this Honorable Court to grant him a fifteen (15) day extension to file any and all subsequent pleadings necessary to prosecute his Federal Writ of Habeas Corpus.


Respectfully submitted



Michael McCole

#AS-0521

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8/22/05